

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
CORRECTIONS CORPORATION OF)
AMERICA, et al.,)
)
Defendants.)
)

Pursuant to Rules 5.03 and 7.01 of the Civil Local Rules of Court, the Revised Stipulation and Protective Order entered in this case (Dkt. No. 86) (the “Protective Order”) and the Stipulation and Order Amending Protective Order to Protect Source Selection Information (the “SSI Protective Order”) (Dkt. No. 177), Defendants respectfully request the Court grant Defendants leave to file under seal the Memorandum of Law, the Statement of Undisputed Material Facts and forty-six exhibits filed in support of Defendants’ Motion for Summary Judgment.¹ The limited documents Defendants seek to file under seal (i) were designated as Confidential or Source Selection Information by third-parties, including the Bureau of Prisons (“BOP”); (ii) contain confidential and proprietary information concerning the business strategies and operations of CoreCivic, Inc., formerly known as Corrections Corporation of America, Inc. (the “Company”), which if made public, would cause serious injury to the Company; and/or (ii) contain confidential

¹ Defendants are concurrently filing a version of the Memorandum of Law and Statement of Undisputed Material Facts with all confidential material redacted.